

Robocall Mitigation Plan

AI Access, Inc. (d/b/a AI Access) · One World Trade Center, Suite 800, Long Beach, CA 90831 · FRN 0038876231 · Version 1.0, September 2026

1. About AI Access

AI Access, Inc. is a Delaware corporation (formed April 10, 2026) that provides a HIPAA-compliant communications platform to optometry practices in the United States. The platform gives each practice a business telephone number, an AI receptionist that answers the practice's inbound calls, a cloud softphone for practice staff to place and receive calls, and two-way SMS for appointment reminders and patient communication. Every telephone number and every call is tied to one identified, contracted healthcare practice. AI Access does not sell voice service to the public, does not offer dialer, bulk-calling, or call-center services, and does not accept traffic from other carriers or resellers.

For the purposes of 47 CFR § 64.6300, AI Access is a **voice service provider serving end users**. All of AI Access's PSTN connectivity is provided by a single upstream carrier, **Bandwidth Inc.** (account being established; AI Access has not yet placed any PSTN traffic). AI Access is not a gateway provider and not an intermediate provider; it does not carry any third-party traffic.

2. STIR/SHAKEN caller ID authentication

AI Access's network is entirely IP-based. AI Access does not currently hold its own Service Provider Code (SPC) token or STIR/SHAKEN certificate and does not operate its own signing infrastructure. Under the STI Governance Authority's token access policy, an SPC token requires an Operating Company Number, a current FCC Form 499-A filing, and a Robocall Mitigation Database listing; AI Access, a corporation formed in April 2026 that has not yet commenced service, is in the process of satisfying those prerequisites and is therefore not yet capable of obtaining an SPC token. AI Access accordingly certifies under Option 3 and relies on the extension in 47 CFR § 64.6304(b) for voice service providers that are incapable of obtaining an SPC token due to Governance Authority policy.

In the interim, every call originated on the AI Access platform is handed over IP to Bandwidth Inc., AI Access's sole upstream carrier, and is authenticated under the STIR/SHAKEN framework by Bandwidth's signing service using Bandwidth's certificate before it enters the PSTN; no call reaches the PSTN unsigned. As its traffic volume grows, AI Access intends to obtain its own SPC token and certificate

through the STI Policy Administrator and an approved STI Certificate Authority and to upload that certificate to Bandwidth's hosted signing service so that its calls are signed under its own certificate at full attestation. AI Access will update this plan and its Robocall Mitigation Database certification within 10 business days of any such change, and will review this arrangement at each annual recertification.

3. Specific steps taken to avoid originating illegal robocall traffic

1. **No open origination.** Only authenticated practice staff and the practice's own AI receptionist can place calls, and only from numbers assigned to that practice. Caller ID is set by the platform, never by the end user; a practice cannot spoof any number it does not own.
2. **Closed, healthcare-only customer base.** Customers are licensed optometry practices onboarded individually by AI Access staff (Section 4). There is no self-service signup, no anonymous accounts, and no free trial that can originate PSTN calls.
3. **Consent-gated automated outreach.** Automated calls and messages (appointment reminders, recalls, confirmations) are sent only to existing patients of the practice, only on the basis of a recorded consent event stored in an append-only consent ledger, and only for the purpose the patient consented to. Marketing contact requires prior express written consent. Revocations and opt-outs are honored immediately and stop all further automated contact on that channel.
4. **Volume and rate limits.** Automated outbound traffic is rate-limited per practice and per number, and automated reminders are scheduled within customary business hours (no quiet-hours calling). Anomalous outbound volume for a practice is alerted to AI Access operations and can be suspended per number or per practice.
5. **Full call records.** Every call is logged with the originating account, staff user or automation that triggered it, number used, destination, timestamp, and outcome, retained for the duration required for traceback and regulatory response.
6. **Number hygiene.** Numbers are provisioned from Bandwidth and assigned to exactly one practice at a time; released numbers are quarantined before reuse. E911 dispatchable location is registered for every number.
7. **Suspension and termination.** AI Access will suspend outbound calling for any customer that is the subject of a credible complaint, a traceback, or an enforcement notice, pending investigation, and will terminate any customer found to be originating illegal or unwanted calls.

4. Know-your-customer (KYC) procedures (47 CFR § 64.1200(n)(4))

Before a practice can originate any call, AI Access:

- collects the practice's legal business name, physical practice address, business phone, and the name and role of the responsible owner or manager;
- verifies that the customer is an operating eye-care practice (state optometry license and/or NPI lookup, and the practice's presence in its electronic health record system, with which AI Access integrates);
- executes a written service agreement with an acceptable-use clause that prohibits illegal robocalling, spoofing, and calling without consent, and reserves AI Access's right to suspend service;
- issues named, individually authenticated staff logins (OTP-verified phone number and email) so that every call is attributable to a person or a documented automation.

AI Access records all of this information at onboarding and updates it when the practice's details change. AI Access does not accept customers that intend to resell the service or to originate traffic on behalf of third parties.

5. Know-your-upstream-provider procedures

AI Access has one upstream and downstream carrier, Bandwidth Inc., a U.S. carrier with a current filing in the Robocall Mitigation Database. AI Access does not accept traffic from any other provider. Before adding any other carrier, AI Access will confirm the carrier's Robocall Mitigation Database filing and STIR/SHAKEN status and record that check.

6. Analytics

AI Access does not operate its own third-party call-analytics vendor. AI Access relies on its underlying carrier, Bandwidth Inc., for network-level robocall analytics and blocking, and on its own platform-level controls described in Section 3 (closed customer base, consent gating, rate limits, and full call records).

7. Cooperation with traceback and enforcement

AI Access commits to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group (the registered industry traceback consortium), and to cooperate in investigating and stopping any illegal robocaller that uses its service. Specifically, AI Access will:

- respond to traceback requests within 24 hours of receipt, identifying the originating customer and providing the call detail records described in Section 3;

- upon notification from the FCC Enforcement Bureau that its service is being used to originate illegal traffic, promptly investigate, block the identified traffic, and report to the Bureau on the steps taken within the time the Bureau specifies;
- suspend or terminate any customer found to be originating illegal calls;
- keep this plan and its Robocall Mitigation Database filing current, updating them within 10 business days of any material change and recertifying annually.

8. Robocall mitigation point of contact

Name	Tadeu Souza
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Address	One World Trade Center, Suite 800, Long Beach, CA 90831

Traceback and enforcement requests may be sent to the contact above at any time.

9. Prior actions or investigations

Neither AI Access, Inc. nor any entity under common ownership, management, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing related to illegal robocalling, spoofing, or a deficient Robocall Mitigation Database filing. AI Access has no parent company, subsidiaries, or affiliates.

10. Certification

The undersigned officer certifies that the information in this plan is true and correct and that AI Access, Inc. has implemented the procedures described above.

Tadeu Souza, Founder and Chief Executive Officer, AI Access, Inc. · Date:
September 29, 2026